

FILE STRUCTURE GUIDANCE

for

REGION I SUPERFUND NPL SITE FILES, SUPERFUND REMOVAL SITE FILES, and FEDERAL FACILITY SITE FILES

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I: INTRODUCTION

A. Scope

This document describes the file structure for all records (paper, electronic, microfiche, CD-ROM, etc.) associated with Region 1's National Priorities List (NPL), Federal Facility, Site Assessment, and Removal sites. Region 1's Removal sites include separate time-critical removal actions and removal actions (both critical and non-time-critical) taken at Remedial sites.

B. Background and Purpose

The File Structure Guidance describes how Region 1's NPL, Removal, Site Assessment, and Federal Facility site records will be organized. This document is one of the key tools in the Region 1 OSRR RIC records management program. Submitting documents under the guidelines described within the following sections will help the records center staff maintain consistency and effectiveness in the way that records are managed. The benefits of a comprehensive records management program include: greater efficiency of filing and retrieval of records, the ability to maintain a higher level of security for sensitive records, and improved utilization of limited storage space.

Another major tool in the organization and management of the OSRR RIC is the Superfund Enterprise Management System (SEMS). SEMS allows Records Center staff to create and maintain electronic copies of Region 1 records as portable document format (PDF) files. Electronic records are classified using the same file structure as that used for paper documents; some additional advantages include full-text search capabilities and the ability to compile data to meet varying criteria(site name, date, file break number, etc.).

The objective of this tool is to provide a file structure that is functional, consistent and easy to understand, and allow EPA staff to enter documents into the records system in an efficient manner. To achieve this objective, a wide range of Region I staff (e.g., site managers, on-scene coordinators, PRP support team, Office of Environmental Stewardship staff) was consulted in order to create a user-intuitive system that also allows the OSRR RIC staff an effective means to manage information requests from both internal (EPA staff) and external sources (the general public).

C. Organization of this Document

The remaining sections of this document are arranged as follows:

- Chapter II presents answers to frequently asked questions about Superfund records management.
- Chapter III presents the Region I Superfund NPL, Removal and Federal Facility **Site File Structure**, in outline form.
- Chapter IV presents **Guidelines** on the site file structure --i.e., a more detailed explanation of the types of records that belong in each section of the site file structure and how they should be arranged.
- Chapter V presents an **Index** of selected key records. The documents are listed in alphabetical order, indicating the section of the site file structure in which they

should be filed. Source documents are indicated by placing an “S” along the right hand side of the index pages.

D. **Updates**

This is Version 5 of the File Structure Guidance which supersedes Version 4.1 (May 2007). The original edition (1.0) was published October 5, 1987. Use Version 2.0, 3.1, or 4.1 for help in retrieving documents from older site files. This version also replaces Region I Federal Facility Superfund Section Final Modified File Structure dated July 17, 1992. As the Superfund program continues to evolve and change, it may be necessary to update or revise the site file structure. Revisions will be issued as appropriate.

II. SUPERFUND RECORDS MANAGEMENT QUESTIONS AND ANSWERS

Purpose of this Section

To present key Superfund records management questions and answers to assist EPA Region I Office of Site Remediation and Restoration (OSRR) Remedial Project Managers (RPMs) and Office of Environmental Stewardship (OES) attorneys in managing Superfund site records.

Superfund Records Management -- Question and Answers

Filing Records

1. Who is responsible for filing records into the site file?

The members of the case team (including the Remedial Project Manager (RPM), On-Scene Coordinator (OSC), Community Involvement Coordinator (CIC), Site Assessment Manager (SAM), enforcement staff, and Office of Environmental Stewardship attorneys) are responsible for coding and periodically transferring their site documents to the OSRR Records and Information Center (OSRR RIC). The case team can also set up workflows where records are submitted to the OSRR RIC directly by off-site contractors or other stakeholders. OSRR RIC staff will generate labels for file folders and accordion folders, apply the site document stamp (which indicates site name, file break, SEMS DocID, if applicable, and access type if not captured in SEMS) to each document, and then file the document in the appropriate location.

2. When should I transfer site records to the OSRR RIC?

You should transfer records to the OSRR RIC when they are no longer required on a weekly basis. Staff may transfer original documents when they are generated or received/EPA staff should use convenience copies (either hardcopy or digital) for their day-to-day reference. EPA staff is encouraged to code and transfer documents to the OSRR RIC regularly to ensure that documents are integrated into the site file on a timely basis. *After completion of a removal action, the OSC will transfer the site file to the OSRR RIC.*

3. How do I transfer a record to the OSRR RIC?

Document coding forms should be completed by the EPA staff for each document or similar groups of documents to be placed into the site file. The site name, operable unit, major break (phase), and access type should be indicated. Other special directions (e.g., capture in SEMS, upload to the web, CERCLIS Source document) should also be indicated on the coding form. Document coding forms are available in the OSRR RIC, and on-line at <http://r1-gis-web.r1.epa.gov:9876/osrr/recordscenter/rmcoding.pdf>.

Records may be transferred at the OSRR RIC Service Desk:

1st floor Service Desk
7th floor Service Desk
Telephone (x 8-1440)
Interoffice Mail (mail code OSRR02-3)
E-mail: Records-OSRR R1

4. **I have a record that really could be filed in more than one break. How do I code it?**

Using the index and break descriptions in this document, try to choose the break in which the document would most logically fit. If you still think a document should be filed in more than one break, do not make a copy of the document. Instead, indicate on a coding sheet that the document should be filed in one break and cross-referenced to another. SEMS may allow for a document to be indexed to more than one break. The OSRR RIC staff will place a paper target sheet in the “supporting” break directing a searcher to the location of the hardcopy document.

5. **I cannot determine a proper place to file a document. Should I create a new major/minor break?**

No. All documents currently produced or received by EPA in support of technical or enforcement activities at a Superfund site may be filed in a minor break in this file structure. If you do not know where to file a document, consult the OSRR RIC staff.

6. **Is there flexibility to arrange documents in the site file in a different way than outlined in this Site File Structure?**

No, you should follow the arrangements indicated in the file structure. The file structure's two primary purposes are to reduce time required to locate site documents and to ensure consistency across all Region I Superfund site files. If rearranging a particular break in your site file significantly reduces the time required to locate documents, then a case team can request a change in procedure. RPMs and attorneys should consult OSRR RIC staff *before* determining whether a minor break should be arranged differently than indicated in the file structure. Any changes to normal procedure should be documented in the OSRR RIC Request Tracking System (RTS).

7. **What should I do with duplicate documents?**

Duplicate copies should not be sent to the OSRR RIC. The site file should have only one record copy of a document. You may want to keep a convenience copy of the document at your workstation for ease of reference. These convenience copies should be stamped with a Copy Stamp provided by the OSRR RIC. This stamp also includes a space to indicate the SEMS DocID of the record copy if one has been assigned.

Duplicate documents may be disposed of unless there is a litigation hold on the site or subject matter. Privileged documents should be disposed of in locked shred bins or shredded. If you have questions about litigation holds or privileges, please contact the site attorney.

8. **What should I do with marked-up duplicates?**

In the event that two copies of a document exist and one has significant margin comments (marginalia), both should be retained in the site file. A document with marginalia constitutes a new record.

Wherever possible, comments on documents (especially those on voluminous reports) should be consolidated into a letter or memorandum, rather than written in the margins. Once all comments on a report are documented and the working copy is no longer required, the report may be recycled (as long as a clean copy exists in the site file).

9. **I have a document which contains Confidential Business Information (CBI). Does it go in the site file?**

Records with CBI should be captured in SEMS, logged in with the Document Control Officer (DCO), and stored in red folders in the Superfund site files. Independent Government Cost Estimates (IGCEs) should be returned to the EPA Contracts Office immediately.

10. **Whom should I contact if I have questions about CBI or other potentially sensitive records?**

Contact the CBI Document Control Officer (DCO), (Holly Inglis x 8-1413)

11. **Whom should I contact if I have questions about file structure or site file organization issues?**

Contact the OSRR RIC Service Desk staff at x 8-1440.

Retrieving Records

1. **How do I retrieve documents from my site file?**

Since February of 2010, the OSRR RIC has a policy of not circulating hardcopy original records. Document retrieval can be:

- Electronic (via SEMS)
- Reviewed in the Site File/other OSRR RIC staged area
- Circulated in very limited circumstances

Many documents have been indexed and scanned and are available through SEMS. Only authorized personnel who have taken CBI training may review files in the records stacks. Upon request, OSRR RIC staff will capture additional documents into SEMS for your reference. Alternately, documents may be reviewed in the OSRR RIC Reading Room on the 1st floor. In limited circumstances hardcopy records may be removed from the OSRR RIC. These documents must be entered into the Circulation database when they are removed from the site file.

2. **How long can I keep site file documents?**

Currently, EPA OSRR staff in the Remedial program are discouraged in circulating records. They are rather directed to SEMS to retrieve their records electronically. There are

programs that do not have the benefit of the tool, SEMS. Those staff members can circulate records.

Hardcopy original site file records may be circulated for as long as you are actively using them, but must be returned through an OSRR RIC staff member to be charged in and refiled. A quarterly reminder will be sent to you if you wish to keep them longer.

Administrative Records

1. When should I compile an Administrative Record for my site?

For remedial sites, Region I begins the Administrative Record compilation process when the Remedial Investigation Work Plan is signed. The RPM collects appropriate site documents (those documents "which form the basis for the selection of the response action"). The OSRR RIC captures the documents in SEMS, creates the administrative record collection. When the final Feasibility Study Report and Proposed Plan are completed, the initial Administrative Record File is burned onto a CD/DVD-ROM and made available at the start of a public comment period (if one is needed). After the public comment period, the Administrative Record collection is updated and the collection is burned to a compact disk within three business days of the signing of the Record of Decision (ROD) or other decision document.

For time-critical removal actions, Administrative Records must be compiled within 60 days after the initiation of the removal action.

For non-time-critical removal actions (such as those completed through the Superfund Accelerated Cleanup Model or SACM), Administrative Records must be compiled when the Engineering Evaluation/Cost Analysis (EE/CA) is made available for public comment and finalized after the action memorandum is signed.

RPMs should check with the Administrative Record coordinator for additional information concerning the contents of and process for compiling Administrative Records.

2. Whom should I contact if I have questions about Administrative Records?

Contact the Administrative Record Coordinator, (Holly Inglis x 8-1413).

III. Region I Superfund NPL, Removal Action, and Federal Facility Site Structure

Purpose of this Section

The purpose of this section is to present the site file structure in outline format. The file structure has 20 major divisions or "major breaks" also referred to as Phases. Within each major break is a series of "minor breaks." The records for each Superfund NPL site, Site Assessment site, Removal Action site, and Federal Facility in Region 1 will be arranged according to this hierarchy of major and minor breaks. Documents received after February 2012 will be filed according to this new version of the site file structure, however documents in the existing file will remain where they have been filed.

Those minor breaks that were created for earlier versions but are no longer applicable in Version 5, have been marked as "obsolete". Incoming documents will not be filed in these "obsolete" breaks after they have become obsolete. For additional detail on the contents of each major and minor break, and guidelines on the appropriate arrangement of records within each break, see Chapter IV. For an alphabetized list of selected key Superfund records, with the minor break given for each, see Chapter V.

Use version 2.0, 3.1, or 4.1 file structure guidance for assistance in retrieving documents from older site files.

Region I Superfund NPL, Removal Action, and Federal Facility Site File Structure

- 1.0 Site Assessment
 - 1.1 Site Discovery
 - 1.2 Preliminary Assessment
 - 1.3 Site Inspection/Investigation
 - 1.4 Records Related to CERCLIS [**Obsolete**]
 - 1.5 Correspondence Related to Site Assessment
 - 1.6 Hazard Ranking System (HRS) Packages
 - 1.7 Correspondence Related to Proposal of a Site to the NPL [**Obsolete**]
 - 1.8 Responses to Comments on the Proposal [**Obsolete**]
 - 1.9 Comments and Responses to Comments [**Obsolete**]
 - 1.10 HRS Narrative Summary [**Obsolete**]
 - 1.11 Quality Assurance (QA) Signed HRS Package - Non-Releasable [**Obsolete**]
 - 1.12 Non-Releasable Hazard Ranking System (HRS) Packages [**Obsolete**]
 - 1.13 Contractor Correspondence [**Obsolete**]
 - 1.14 Site Assessment Contracts
 - 1.15 Contractual Documents
 - 1.16 Contractor Vouchers [**Obsolete**]
 - 1.17 Contractor Progress Reports [**Obsolete**]
 - 1.18 Site Assessment Support Documentation (*TDDs*)
- 2.0 Removal Response
 - 2.1 Correspondence
 - 2.2 Removal Response Reports
 - 2.3 Sampling and Analysis Data
 - 2.4 Pollution Reports (POLREPs)
 - 2.5 On-Scene Coordinator (OSC) Reports
 - 2.6 Work Plans and Progress Reports
 - 2.7 Invoices
 - 2.8 Scopes of Work
 - 2.9 Action Memoranda
 - 2.10 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs)
 - 2.11 Applicable or Relevant and Appropriate Requirements (ARARs)
 - 2.12 On-Site Registers and Logs
 - 2.13 Daily Work Reports
 - 2.14 Daily Financial Reports
 - 2.15 Removal Response Subcontractor Documents
 - 2.16 Task Orders/Purchase Orders
 - 2.17 CERCLIS Removal Site Records
 - 2.18 Off-Site Disposal Reports

I. Remedial Investigation (RI)

- 3.1 Correspondence
- 3.2 Sampling and Analysis Plans & Data
- 3.3 Scopes of Work
- 3.4 Interim Deliverables
- 3.5 Applicable or Relevant and Appropriate Requirements (ARARs) [**Obsolete**]
- 3.6 Remedial Investigation (RI) Reports
- 3.7 Work Plans and Progress Reports
- 3.8 Cost Reports and Invoices
- 3.9 Health Assessments
- 3.10 Endangerment/Baseline Risk Assessments
- 3.11 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs)
- 3.12 Action Memoranda [**Obsolete**]
- 3.13 Bid Documents

II. Feasibility Study (FS)

- 4.1 Correspondence
- 4.2 Sampling and Analysis Data
- 4.3 Scopes of Work
- 4.4 Interim Deliverables
- 4.5 Applicable or Relevant and Appropriate Requirements (ARARs) [**Obsolete**]
- 4.6 Feasibility Study (FS) Reports
- 4.7 Work Plans and Progress Reports
- 4.8 Cost Reports and Invoices
- 4.9 Proposed Plans for Selected Remedial Action
- 4.10 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs)

III. Record of Decision (ROD)

- 5.1 Correspondence
- 5.2 Applicable or Relevant and Appropriate Requirements (ARARs)
- 5.3 Responsiveness Summaries
- 5.4 Record of Decision (ROD)
- 5.5 Work Plans and Progress Reports [**Obsolete**]
- 5.6 Cost Reports and Invoices [**Obsolete**]
- 5.7 Interagency Agreements (IAGs) [**Obsolete**]
- 5.8 ROD Briefing Documents
- 5.9 Scopes of Work [**Obsolete**]

6.0 Remedial Design (RD)

- 6.1 Correspondence
- 6.2 Sampling and Analysis Data
- 6.3 Applicable or Relevant and Appropriate Requirements (ARARs)
- 6.4 Remedial Design Reports
- 6.5 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs)
- 6.6 Work Plans and Progress Reports
- 6.7 Cost Reports and Invoices

- 6.8 Scopes of Work
- 6.9 Bid Documents
- 7.0 Remedial Action (RA)
 - 7.1 Correspondence
 - 7.2 Sampling and Analysis Data
 - 7.3 Scopes of Work
 - 7.4 Applicable or Relevant and Appropriate Requirements (ARARs)
 - 7.5 Remedial Action Reports
 - 7.6 Work Plans and Progress Reports
 - 7.7 Cost Reports and Invoices
 - 7.8 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs)
 - 7.9 Bid Documents
- 8.0 Post Remedial Action
 - 8.1 Correspondence
 - 8.2 Deletion from National Priorities List
 - 8.3 Long-Term Response Reports
 - 8.4 Long-Term Response Monitoring
 - 8.5 Work Plans and Progress Reports
 - 8.6 Cost Reports and Invoices
 - 8.7 Institutional Controls
 - 8.8 Redevelopment Correspondence
 - 8.9 Redevelopment Reports and Specifications
 - 8.10 Redevelopment Maps & Plans
- 9.0 State Coordination
 - 9.1 Correspondence
 - 9.2 Cooperative Agreements
 - 9.3 Superfund State Contracts
 - 9.4 State Assurances **[Obsolete]**
 - 9.5 Quarterly Progress Reports **[Obsolete]**
 - 9.6 Quarterly Financial Reports **[Obsolete]**
 - 9.7 Letters of Credit
 - 9.8 State Contractor Documents **[Obsolete]**
 - 9.9 Responsible Federal Agency-State Contracts
 - 9.10 State Technical and Historical Records
- 10.0 Enforcement/Negotiation
 - 10.1 Correspondence
 - 10.2 Department of Justice (DOJ) - Referral Documents
 - 10.3 State and Local Enforcement Records
 - 10.4 Interviews, Depositions, and Affidavits
 - 10.5 Initiation of Negotiations with Multiple PRPs
 - 10.6 PRP-Specific Negotiations **[Obsolete]**
 - 10.7 EPA Administrative Orders
 - 10.8 EPA Consent Decrees

- 10.9 Pleadings
- 10.10 Trial Documents
- 10.11 PRP Enforcement Work Plans **[Obsolete]**
- 10.12 Litigation Support Documents **[Obsolete]**
- 10.13 Scopes of Work
- 10.14 Work Plans and Progress Reports
- 10.15 Cost Reports and Invoices
- 10.16 Federal Facility Agreements
- 10.17 Dispute Resolution/Non-Compliance Documents **[Obsolete]**
- 10.18 Copies of RCRA Documents Which Have Been Reviewed for Privilege
- 10.19 Decision not to Pursue Costs
- 10.20 Tolling Agreements

- 11.0 Potentially Responsible Parties (PRPs)
 - 11.1 PRP Lists
 - 11.2 Contractor Correspondence
 - 11.3 Work Plans and Progress Reports
 - 11.4 Cost Reports and Invoices
 - 11.5 Multiple PRP Documents
 - Multiple PRP Correspondence
 - Multiple PRP Evidence - Government Agency Documents
 - Multiple PRP Evidence
 - Multiple PRP-Related Documents
 - Multiple PRP Financial Status Documents
 - 11.6 Site Level - Evidence - Government Agency Documents **[Obsolete]**
 - 11.7 PRP Steering Committee Documents **[Obsolete]**
 - 11.8 EPA/Contractor Deliverables and Supporting Documentation
 - 11.9 PRP-Specific Documents
 - PRP-Specific Correspondence
 - PRP-Specific Evidence - Government Agency Documents
 - PRP-Specific Evidence
 - PRP-Related Documents
 - PRP-Specific Financial Status Documents
 - 11.10 PRP-Specific Evidence - Government Agency Documents **[Obsolete]**
 - 11.11 PRP-Specific Evidence **[Obsolete]**
 - 11.12 PRP-Related Documents **[Obsolete]**
 - 11.13 Financial Status Documents **[Obsolete]**
 - 11.14 Title Searches
 - 11.15 Non-Binding Allocation of Responsibility (NBAR)
 - 11.16 Scopes of Work

- 12.0 Cost Recovery
 - 12.1 Correspondence
 - 12.2 Software Package for Unique Reports (SPUR Reports) **[Obsolete]**
 - 12.3 Cost Summaries
 - 12.4 Travel Vouchers **[Obsolete]**
 - 12.5 Timesheets **[Obsolete]**

- 12.6 Agency Indirect Costs [**Obsolete**]
- 12.7 Miscellaneous Procurement Expenses
- 12.8 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs) [**Obsolete**]
- 12.9 State Cooperative Agreements [**Obsolete**]
- 12.10 EPA-State Contracts [**Obsolete**]
- 12.11 Contractor Deliverables Related to Cost Recovery
- 12.12 Work Plans and Progress Reports Related to Cost Recovery
- 12.13 Cost Reports and Invoices Related to Cost Recovery
- 12.14 Cost Recovery Documentation Checklists
- 12.15 Contractor Cost Information
- 12.16 Settlement Agreements -- Final Payment Schedules-Single PRP [**Obsolete**]
- 12.17 Settlement Agreements -- Final Payment Schedules-Multiple PRPs [**Obsolete**]
- 12.18 Work Performance Documents
- 12.19 Special Account Documents
- 12.20 Cost Recovery Packages

- 13.0 Community Relations
 - 13.1 Correspondence
 - 13.2 Community Relations Plans
 - 13.3 News Clippings/Press Releases
 - 13.4 Public Meetings/Hearings
 - 13.5 Fact Sheets/Information Updates
 - 13.6 Mailing Lists
 - 13.7 Technical Assistance Grants (TAGs)
 - 13.8 Scopes of Work
 - 13.9 Work Plans and Progress Reports
 - 13.10 Cost Reports and Invoices
 - 13.11 Technical Review Committee (TRC) Documents

- 14.0 Congressional Relations
 - 14.1 Correspondence
 - 14.2 Transcripts
 - 14.3 Testimonies
 - 14.4 Published Hearing Records

- 15.0 Freedom of Information Act (FOIA) Management
 - 15.1 Correspondence
 - 15.2 Requests/Responses
 - 15.3 Requests/Responses [**Obsolete**]
 - 15.4 Appeals

- 16.0 State and Federal Natural and Historical Resource Trustee
 - 16.1 Correspondence
 - 16.2 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs)
 - 16.3 Natural Resource Trustee Release
 - 16.4 Trustee Notification Form and Selection Guide
 - 16.5 Technical Issue Papers

- 17.0 Site Management Records
 - 17.1 Correspondence
 - 17.2 Access Records
 - 17.3 Site Security Records
 - 17.4 Non-Print Materials
 - 17.5 Site Descriptions/Chronologies
 - 17.6 Site Management Plans and Reviews
 - 17.7 Reference Documents
 - 17.8 Federal and Local Technical and Historical Records
 - 17.9 Site Safety Plans
 - 17.10 Base Closure Documents
- 18.0 Toxic Substances Control Act (TSCA) Records
 - 18.1 TSCA Records
- 19.0 Resource Conservation and Recovery Act (RCRA) Records
 - 19.1 RCRA Records
- 20.0 OSRR RIC
 - 20.1 Administrative Record Indexes
 - 20.2 Federal Archiving Forms **[Obsolete]**
 - 20.3 Work Plans and Progress Reports

IV. Guidelines on the Site File Structure

Purpose of this Section

To provide guidelines and detailed descriptions of the types of records which belong in each minor break of the file structure. The examples listed in each description are not meant to be exhaustive (i.e., they do not represent the only documents to be filed in each minor break).

To distinguish which documents in each break are SEMS Source (Program Required/Recommended) documents (these documents are flagged within each file break)

Due to their importance in the Superfund program and high reference rate, all Source documents are automatically captured (indexed and scanned) into SEMS as part of routine processing.

Source Documents are documents that serve as the source of information entered into CERCLIS and/or into the Institutional Control Tracking System (ICT). Unique document specific indexing and processing standards (DSIPS) are followed to ensure the document is complete and meets agency guidance.

Key Documents are a subset of Source documents that require additional handling/distribution to HQ. The DSIPS reflect those additional requirements.

To identify which minor breaks have other than standard chronological arrangement.

To note that undated documents are filed after the chronological sequence.

Guidelines on the Site File Structure

1.0 Site Assessment (SA)

1.1 Site Discovery

This section will contain records relating to entry of the site into SEMS-SM and with requests for a change in a facility's name, location or combination with another site. This includes the pre-screening process.

E-Mail Confirmation of Site Spill Identifier (SSID) (Source Document)

Site Discovery Form (Source Document)

Site Identification Forms (SIF)

EPA Form 2070-8

Pre-CERCLA Screening Report (Source Document)

File Arrangement: Documents will be arranged chronologically.

1.2 Preliminary Assessment

This section will contain records associated with the site's preliminary assessment

Site Decision Form for Preliminary Assessment (PA) Report (Source Document)

Site Decision Form for Combined PA/SI Report (Source Document)

Preliminary Assessment (PA) Reports (Source Document)

Preliminary Assessment/Site Investigation (PA/SI) (Source Document)

Potential Hazardous Waste Site Preliminary Assessment

Associated comments

EPA Form 2070-12 or EPA Form 2070-2,

Site Response Assessment

Correspondence will be filed in 1.5 Correspondence Related to Site Assessment. Supporting documentation (e.g., sampling data, TDDs) will be filed in 1.18 Site Assessment Support Documentation.

File Arrangement: Documents will be arranged chronologically.

1.3 Site Inspection / Investigation

This section will contain records associated with a site's inspection:

- Site Decision Form for Site Investigation (SI) Report (Source Document)
- Site Decision Form for Expanded SI Approval Memo (Source Document)
- Expanded Site Inspection Approval Memo (Source Document)
- Site Inspection (SI) Report (Source Document)
- Associated comments
- Potential Hazardous Waste Site - Site Inspection (SI) Report
- EPA Form 2070-13
- EPA Form 2070-3
- Site inspection prioritization
- Federal Facility Site Assessment Review Report (Source Document)

This section will also contain confirmation studies and confirmation/quantification studies. Combined Preliminary Assessment/Site Inspection or Investigation (PA/SI) Reports will be filed in 1.2 Preliminary Assessment. Correspondence will be filed in 1.5 Correspondence Related to Site Assessment. Supporting documentation (e.g., sampling data, TDDs) will be filed in 1.18 Site Assessment Support Documentation.

File Arrangement: Documents will be arranged chronologically.

1.4 Records Related to CERCLIS - Obsolete

This section is obsolete. Use 1.1.

1.5 Correspondence Related to Site Assessment

This section will contain correspondence (e.g., letters, memoranda) and notes from meetings or telephone calls related to site assessment.

File Arrangement: Documents will be arranged chronologically.

1.6 Hazard Ranking System (HRS) Packages

This section will contain those HRS packages which have passed the Regional quality control (QC), Headquarters quality assurance (QA) and have been published in the Federal Register. This section will also contain HRS packages (which include comments and responses to comments), summaries and narrative summaries, both releasable and non-releasable.

- Hazard Ranking System (HRS) Package (releasable) (Source Document)
- Unarchive Memo or Equivalent (Source Document)

File Arrangement: Documents will be arranged chronologically.

1.7 Correspondence Related to Proposal of a Site to the NPL - Obsolete

This section is obsolete. Use 1.6.

1.8 Responses to Comments on the Proposal - Obsolete

This section is obsolete. Use 1.6.

1.9 Comments and Responses to Comments - Obsolete

This section is obsolete. Use 1.6.

1.10 HRS Narrative Summary - Obsolete

This section is obsolete. Use 1.6.

1.11 Quality Assurance (QA) Signed HRS Package - Non-Releasable - Obsolete

This section is obsolete. Use 1.6.

1.12 Non-Releasable Hazard Ranking System (HRS) Packages - Obsolete

This Section is obsolete. Use 1.6.

1.13 Contractor Correspondence - Obsolete

This section is obsolete. Use 1.6.

1.14 Site Assessment Contracts

This section will contain:

- Site assessment contracts and any sub-contracts
- Contract Modifications (Source Document)

File Arrangement: Documents will be arranged chronologically.

1.15 Contractual Documents

This section will contain:

- Work plans
- Work plan approval letters
- Work plan amendments
- Site assessment contractor performance evaluations,
- Vouchers submitted by contractors during site assessment,
- Work assignments,
- Work assignment amendments,
- Amendment requests,
- Cost estimates for specific work assignment tasks,
- Comments on the work plans
- Award fee performance reports, and
- Progress reports associated with site assessment.

Progress reports include all field notes and trip reports received from contractors. Also, progress reports that contain cost estimates or expenditures will be filed in this section.

File Arrangement: Documents will be arranged by contractor, and then chronologically.

1.16 Contractor Vouchers - Obsolete

This section is obsolete. Use 1.15.

1.17 Contractor Progress Reports - Obsolete

This section is obsolete. Use 1.15.

1.18 Site Assessment Support Documentation

This section will contain records which support the preliminary assessment and site inspection

Technical Direction Documents (TDDs) (Source Document)

Sampling and analysis data,

Contractor deliverables,

Field reports

File Arrangement: Documents will be arranged chronologically.

2.0 Removal Response

2.1 Correspondence

This section will contain:

- Correspondence (e.g., letters, memoranda)
- Oversight Letter (PRP)
- Notes from meetings or telephone calls
- Cost Documentation Indexes
- Interagency Agreements (Source Document)
- Incident Reports and
- EPA trip reports related to Removal Response activities

Letter reports with sampling data will be filed in 2.3 Sampling and Analysis Data.

File Arrangement: Documents will be arranged chronologically.

2.2 Removal Response Reports

This section will contain:

- EE/CA approval letters/memo (Source document)
- Site Investigation Closure Memorandum (Source document)
- Preliminary Assessment/Site Investigation Reports (Source document)
- Removal Assessment Reports (Source document)
- Removal Assessment Closure Memorandum (Source document)
- Health Consultations (ATSDR)
- Engineering Evaluation/Cost Analyses (EE/CA) Report (Source document)
- Quality Assurance Project Plan
- Health and Safety Plans
- Expedited Response Actions
- Preliminary Assessment Check Lists
- Response action plans
- Drum Location Surveys
- Bioassessment disposal information
- Spill Reports
- Accident Investigation reports
- Photographs of removal actions.

File Arrangement: Documents will be arranged chronologically.

2.3 Sampling and Analysis Data

This section will contain unvalidated and validated data obtained in support of Removal Response activities:

- Chain of custody forms
- Data summary sheets
- Data validation reports
- Sampling plans
- Field sampling plans
- Air monitoring data
- Boring logs
- Chemical descriptions,
- Drum logs
- Drum inspection logs
- Pump test
- Seismic refraction surveys
- Special analytical services requests
- Groundwater monitoring data
- Soil monitoring data
- Letter reports with sampling data
- Contract Laboratory Program (CLP) Status reports)

File Arrangement: Documents will be arranged by case number, if assigned, or by contractor and then chronologically.

2.4 Pollution Reports (POLREPS)

This section will contain POLREPs issued by a site's On-Scene Coordinator. The first and the final POLREP are Source documents.

File Arrangement: Documents will be arranged chronologically.

2.5 On-Scene Coordinator (OSC) Reports

This section will contain:

- Final On-Scene Coordinator (OSC) Reports
- On-Scene Coordinator (OSC) Reports
- Comments on the On-Scene Coordinator (OSC) Reports
- Responses to comments on the On-Scene Coordinator (OSC) Reports

Comments and responses will be filed following the appropriate reports.

File Arrangement: Documents will be arranged chronologically.

2.6 Work Plans and Progress Reports

This section will contain:

- Progress reports associated with Removal Response activities.
- Work plans
- Work plan approval letters
- Work plan amendments
- Award fee performance reports
- Amendment requests
- Comments on work plans/amendments
- Contractor reports
- Contractor performance reports
- Work assignments
- Work assignment amendments

Progress reports include all field notes and trip reports received from contractors. Also, progress reports that contain cost estimates or expenditures will be filed in this section.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency, and then chronologically.

2.7 Invoices

This section will contain invoices associated with Removal Response activities. If invoices are attached to progress reports, the package will be filed in 2.6 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged alphabetically by contractor, and then chronologically.

2.8 Scopes of Work

This section will contain scopes of work or statements of work and related comments associated with Removal Response activities. If scopes of work or statements of work are attached to work assignments, the package will be filed in 2.6 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged chronologically.

2.9 Action Memoranda

This section will contain:

- Action Memorandum (Source document)
- Amendments to the Action Memorandum (Source document)
- Closure Action Memorandum (Source document)
- Enforcement Addenda to the Action Memorandum (Source document)
- Removal Administrative Record (AR) Indices

Related comments and responses to comments will be filed following the appropriate action memoranda. Removal Administrative Record Indices will also be placed here.

File Arrangement: Documents will be arranged chronologically.

2.10 Interagency Agreements (IAGs)/Memoranda of Understanding

This section will contain interagency agreements (*Source documents*) and memoranda of understanding between EPA and other federal agencies to perform removal actions.

File Arrangement: Documents will be arranged chronologically.

2.11 Applicable or Relevant and Appropriate Requirements (ARARs)

This section will contain ARARs and associated correspondence relevant to Removal Response activities.

File Arrangement: Documents will be arranged chronologically.

2.12 On-Site Registers and Logs

This section will contain registers and logs of personnel, equipment, and material associated with Removal Response activities:

- Equipment and Expendable Materials Entry Logs
- Personnel Entry and Exit Logs
- CERCLA Vehicle/Equipment Entry/Exit Logs
- Manifests
- Bills of lading
- Shipping documents
- Fire extinguisher inspection logs
- First aid weekly checklists
- Security Logs
- Waste Profiles/Waste Material Profile Sheets
- Field Logs
- OSC notes.

File Arrangement: Documents will be arranged chronologically.

2.13 Daily Work Reports

This section will contain daily work reports prepared by EPA and its contractors for Removal Response activities:

- Daily Work Orders
- Daily Summary Cleanup Reports

File Arrangement: Documents will be arranged chronologically.

2.14 Daily Financial Reports

This section will contain daily financial reports prepared by EPA and its contractors for Removal Response activities:

- Hazardous Substance Response Fund Contractor Cost Reports
- EPA Form 1900-55
- Incident Obligation Logs

File Arrangement: Documents will be arranged chronologically.

2.15 Removal Response Subcontractor Documents

This section will contain contractual documents associated with the procurement of subcontractor assistance for Removal Response activities:

- Requests for proposals
- Bid documents

File Arrangement: Documents will be arranged chronologically.

2.16 Delivery Orders/Purchase Orders

This section will contain documents associated with the obligation of funds for Removal Response activities:

- Contract Modifications (Source document)
- Task Order for Emergency Response Services
- EPA Form 1900-59
- Original Amendment of Solicitation/Modification of Contract
- Original Procurement Request/Order
- Purchase orders
- EPA Form 1900-8

File Arrangement: Documents will be arranged chronologically.

2.17 CERCLIS Removal Site Records

This section will contain Removal Response records related to CERCLIS:

- Facility Index System (FINDS) Forms
- Site Identification Forms (SIFs).

File Arrangement: Documents will be arranged chronologically.

2.18 Off-Site Disposal Reports

This section will contain contractor-generated reports describing the disposition of each drum on a manifest.

File Arrangement: Documents will be filed by Manifest Number.

3.0 Remedial Investigation (RI)

3.1 Correspondence

This section will contain:

- Correspondence (letters, memoranda)
- Oversight Letter (PRP)
- Notes from meetings or telephone calls
- Contractor curriculum vitae (resumes)
- Residential well results
- EPA trip reports related to the Remedial Investigation.

Letter reports with sampling data will be filed in 3.2 Sampling and Analysis Data. Similar documents related to the START Program will also be filed here.

File Arrangement: Documents will be arranged chronologically.

3.2 Sampling and Analysis Plans & Data

This section will contain unvalidated and validated data obtained during the Remedial Investigation:

- Data validation reports
- Chain of Custody forms
- Field Sampling Plans
- Air monitoring data
- Boring logs
- Chemical descriptions
- Contract Laboratory Program Status (CLP) reports
- Groundwater monitoring data
- Soil monitoring data
- Letter reports with sampling data

File Arrangement: Documents will be arranged by case number, if assigned, or by contractor, and then chronologically.

3.3 Scopes of Work

This section will contain scopes of work or statements of work and related comments associated with the Remedial Investigation. If scopes of work or statements of work are attached to work assignments, the package will be filed in 3.7 Work Plans and Progress Reports. If SOW is attached to an Administrative Order it will be filed in 10.7 Administrative Orders.

File Arrangement: Documents will be arranged chronologically.

3.4 Interim Deliverables

This section will contain deliverables associated with the Remedial Investigation, excluding the Remedial Investigation Report(s):

- Site Operations Plan
- Site Emergency Action Plan
- Field Operations Plan
- Quality Assurance Project Plan -- QAPP
- Remedial Action Master Plan -- RAMP
- Project Operations Plan
- Health and Safety Plans

Documents associated with the START Initiative should also be filed here. Comments and responses to comments will be filed following the appropriate reports.

File Arrangement: Documents will be arranged chronologically.

3.5 Applicable or Relevant and Appropriate Requirements (ARARs) - Obsolete

This section is obsolete. Pre-Record of Decision ARARs will be filed in 5.2

3.6 Remedial Investigation (RI) Reports

This section will contain:

- Contract modifications, interagency agreements or Cooperative agreements that mark the initiation of the Remedial Investigation (Source document)
- Remedial Investigation (RI) Reports (Source document)
- Remedial Investigation/Feasibility Study (RI/FS) Reports (Source document)
- Expanded Site Inspection/Remedial Investigation (Source document)
- Remedial Investigation (RI) Report Start Memo
- Remedial Investigation (RI) Report approval letters
- Comments on the Remedial Investigation (RI) Reports
- Responses to comments Remedial Investigation (RI) Reports
- Distribution lists
- Executive summaries

For each RI Report, documents will be filed in the following order: distribution list, executive summary, RI Report, appendices, comments on the RI Report, responses to comments, approval letters.

File Arrangement: Documents will be arranged chronologically.

3.7 Work Plans and Progress Reports

This section will contain:

- Progress reports associated with the Remedial Investigation
- Work plans (Source document)
- Work plans approval letters
- Work plan amendments
- Work assignments
- Work assignment amendments
- Amendment requests
- Cost estimates for specific work assignment tasks
- Comments on the work plan
- Award fee performance reports
- Stop work orders

Progress reports include all field notes and trip reports received from contractors. Also, progress reports that contain cost estimates or expenditures will be filed in this section.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency, and then chronologically.

3.8 Cost Reports and Invoices

This section will contain cost reports and invoices associated with the Remedial Investigation. If cost reports and/or invoices are attached to progress reports, the package will be filed in 3.7 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency, and then chronologically.

3.9 Health Assessments

This section will contain:

- Health Assessments
- Health Consultations
- Other health studies related to the Remedial Investigation

Comments and responses to comments will be filed following the appropriate assessment or study. Health studies may be performed by ATSDR, other agencies, organizations, or universities.

File Arrangement: Documents will be arranged chronologically.

3.10 Endangerment/Baseline Risk Assessments

This section will contain:

- Endangerment Assessments
- Ecological Risk Assessments
- Ecological Risk/ Human Health Risk Assessments
- Human Health Risk Assessments
- Health Risk Assessment Start Memo (*Source document*)
- Baseline Risk Assessments

Comments and responses to comments will be filed following the appropriate assessment or study.

File Arrangements: Documents will be arranged chronologically.

3.11 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs)

This section will contain interagency agreements (Source document) and memoranda of understanding between EPA and other federal agencies related to the Remedial Investigation.

File Arrangement: Documents will be arranged chronologically.

3.12 Action Memoranda - Obsolete

This section is obsolete. Action memoranda associated with removal actions will be filed in 2.9 Action Memoranda.

3.13 Bid Documents

This section will contain:

- Invitations for bid
- Submissions by potential contractors
- Proposals
- Qualifications
- Specifications
- Correspondence related to bids during the Remedial Investigation.

File Arrangement: Documents will be arranged chronologically.

4.0 Feasibility Study (FS)

4.1 Correspondence

This section will contain:

- Correspondence (e.g., letters, memoranda)
- Oversight Letter (PRP) (Source document)
- Notes from meetings or telephone calls
- Contractor curriculum vitae (resumes)
- Trip reports related to the Feasibility Study
- Interagency Agreements (Source document)
- Obligation of Funds (Source document)

Letter reports with sampling data will be filed in 4.2 Sampling and Analysis Data.

File Arrangement: Documents will be arranged chronologically.

4.2 Sampling and Analysis Data

This section will contain unvalidated and validated data obtained during the Feasibility Study:

- Data validation reports
- Chain of Custody forms
- Field Sampling Plans
- Air monitoring data
- Chemical descriptions
- Groundwater monitoring data
- Soil monitoring data
- Letter reports with sampling data
- Contract Laboratory Program (CLP) Status reports

File Arrangement: Documents will be arranged case number, if assigned, or by contractor and then chronologically.

4.3 Scopes of Work

This section will contain scopes of work or statements of work and related comments associated with the Feasibility Study. If scopes of work or statements of work are attached to work assignments, the package will be filed in 4.7 Work Plans and Progress Reports. (If Remedial Investigation / Feasibility Study are combined these may be filed in 3.3.)

File Arrangement: Documents will be arranged chronologically.

4.4 Interim Deliverables

This section will contain deliverables associated with the Feasibility Study, excluding the Feasibility Study Report(s):

- Quality Assurance Project Plan
- Bench/Pilot Studies
- Project Operations Plan
- Treatability Studies
- Sensitivity Analyses
- Safety Plans
- Health and Safety Plans

Comments and responses to comments will be filed following the appropriate reports.

File Arrangement: Documents will be arranged chronologically.

4.5 Applicable or Relevant and Appropriate Requirements (ARARs) - Obsolete

This section is obsolete. Pre-Record of Decision ARARs will be filed in 5.2

4.6 Feasibility Study (FS) Reports

This section will contain:

- Contract modifications, Interagency agreements or Cooperative agreements that mark the initiation of the Feasibility Study (Source document)
- Feasibility Study (FS) Reports (Source document)
- Comments on the Feasibility Study
- Feasibility Study approval letters (Source document)
- Distribution lists
- Executive summaries

For each FS Report, documents will be filed in the following order: distribution list, executive summary, FS Report, appendices, comments on the FS Report, responses to comments, approval letters. If the Remedial Investigation /Feasibility Study are combined, these may be filed in 3.6.

File Arrangement: Documents will be arranged chronologically.

4.7 Work Plans and Progress Reports

This section will contain:

- Progress reports
- Work plans (Source document)
- Work Plan Approval Letters
- Work plan amendments (Source document)
- Work assignments
- Work assignment amendments
- Amendment requests
- Cost estimates for specific work assignment tasks
- Comments on the Work Plan
- Award fee performance reports
- Stop work orders

Progress reports include all field notes and trip reports received from contractors. Also, progress reports that contain cost estimates and expenditures will be filed in this section.

File Arrangement: Documents will be arranged alphabetically by contractor, and then chronologically.

4.8 Cost Reports and Invoices

This section will contain cost reports and invoices with the Feasibility Study. If cost reports and/or invoices are attached to progress reports, the package will be filed in 4.7 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged alphabetically by contractor, and then chronologically.

4.9 Proposed Plans for Selected Remedial Action

This section will contain:

- Proposed Plans for Selected Remedial Action (Source document)
- Federal Register Notice of Public Comment Period (Source document)

Comments and responses to comments on draft Proposed Plans will be filed following the appropriate versions. Comments on the final Proposed Plan received during the formal comment period will be filed in 5.3 Responsiveness Summaries.

File Arrangement: Documents will be arranged chronologically.

4.10 Interagency Agreements (IAGs)/ Memoranda of Understanding (MOUs)

This section will contain interagency agreements (*Source documents*) and memorandum of understanding between EPA and other federal agencies related to the Feasibility Study.

File Arrangement: Documents will be arranged chronologically.

4.11 Bid Documents

This section will contain:

Invitations for bid
Submissions by potential contractors
Proposals
Qualifications
Specifications
Correspondence related to bids during the Remedial Investigation.

File Arrangement: Documents will be arranged chronologically.

5.0 Records of Decision (ROD)

5.1 Correspondence

This section will contain:

Correspondence (e.g., letters, memoranda)

Notes from meetings or telephone calls related to the Record of Decision (ROD) and Explanation of Significant Differences (ESD).

State Concurrence (or Non-Concurrence) Letters

ROD Delegation Documents

File Arrangement: Documents will be arranged chronologically.

5.2 Applicable or Relevant and Appropriate Requirements (ARARs)

This section will contain ARARs and associated correspondence.

File Arrangement: Documents will be arranged chronologically.

5.3 Responsiveness Summaries

This section will contain Responsiveness Summaries which address comments raised during the public comment period on the Remedial Investigation, Feasibility Study, and the Final Proposed Plan. Also, actual comments on the Remedial Investigation, Feasibility Study, and Final Proposed Plan received during the formal comment period will be filed in this section (Source document).

File Arrangement: Documents will be arranged chronologically.

5.4 Record of Decision (ROD)

This section will contain:

Decision Document (Source document)

Record of Decision (ROD) (Source document)

Explanation of Significant Differences (Source document)

ROD Amendments (Source document)

Comments on the ROD

Response to comments on the ROD

Site Evaluations Accomplished (SEAs)

No Further Remedial Action Planned (NFRAPs) (Source document)

No Further Action Decision Documents (NFADDs), and related comments will be filed in this section.

File Arrangement: Documents will be arranged chronologically.

5.5 Work Plans and Progress Reports - Obsolete

This section is obsolete. Work plans associated with the FS and Proposed Plan will be filed in 4.7.

5.6 Cost Reports and Invoices - Obsolete

This section is obsolete. Cost Reports associated with the FS and Proposed Plan will be filed in 4.8.

5.7 Interagency Agreements (IAGs) - Obsolete

This section is obsolete. IAGs associated with the FS and Proposed Plan will be filed in 4.10.

5.8 ROD Briefing Documents

This section will contain the documents associated with ROD briefings (e.g., handouts, meeting notes, attendance lists, meeting summaries).

File Arrangement: Documents will be arranged chronologically.

5.9 Scopes of Work - Obsolete

This section is obsolete. Scopes of Work associated with the FS and Proposed Plan will be filed in 4.3.

6.0 Remedial Design (RD)

6.1 Correspondence

This section will contain:

- Correspondence (e.g., letters, memoranda)
- Oversight Letter (PRP)
- Obligation of Funds (Source document)
- Notes from meetings or telephone calls
- Contractor curriculum vitae
- EPA trip reports related to the Remedial Design.

Letter reports with sampling data will be filed in 6.2 Sampling and Analysis Data.

File arrangement: Documents will be arranged chronologically.

6.2 Sampling and Analysis Data

This section will contain:

- Chain of Custody forms
- Field Sampling Plans
- Data validation reports
- Unvalidated data
- Validated data obtained *during* the Remedial Design
- Pre-design sampling and monitoring reports
- Air monitoring data
- Chemical descriptions
- Groundwater monitoring data
- Soil monitoring data
- Letter reports with sampling data
- Contract Laboratory Program (CLP) Status reports
- Environmental monitoring plans
- Environmental groundwater plans

File Arrangement: Documents will be arranged by case number, if assigned, or by contractor and then chronologically.

6.3 Applicable or Relevant and Appropriate Requirements (ARARs)

This section will contain ARARs, Land Disposal Restrictions (LDRs), and associated correspondence relevant to the Remedial Design.

File Arrangement: Documents will be arranged chronologically.

6.4 Remedial Design Reports

This section will contain and final Remedial Design documents produced as the results of a work plan, with related comments and responses to comments:

- 100% Design Reports (Source document)
- Remedial Design 100% approval letter (Source document)
- Quality Assurance Project Plan
- Design Completion Reports
- Pre-Design Reports
- Preliminary Designs
- 30% Design Reports
- 60% Design Reports
- 90% Design Reports
- Health and Safety plans
- Reuse Assessment

Comments and responses to comments will be filed following the appropriate reports.

File Arrangement: Documents will be arranged chronologically.

6.5 Interagency Agreements (IAGs)/ Memoranda of Understanding (MOUs)

This section will contain interagency agreements (Source document) and memoranda of understanding between EPA and other federal agencies related to the Remedial Design.

File Arrangement: Documents will be arranged chronologically.

6.6 Work Plans and Progress Reports

This section will contain:

- Contract Modifications (Source document)
- Progress reports
- Work plans
- Work Plan approval letters
- Work plan amendments
- Work assignments
- Work assignment amendments
- Amendment requests
- Cost estimates for specific work assignment tasks
- Comments on the Work Plan
- Award fee performance reports
- Stop work orders

Progress reports associated with the Remedial Design, (including monthly reports required by the consent decree). Progress reports include all field notes and trip reports received from contractors. Also, progress reports that contain cost estimates and expenditures will be filed in this section.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency, and then chronologically.

6.7 Cost Reports and Invoices

This section will contain cost reports and invoices associated with the Remedial Design. If cost reports and/or invoices are attached to progress reports, the package will be filed in 6.6 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency, and then chronologically.

6.8 Scopes of Work

This section will contain scopes of work or statements of work and related comments associated with the Remedial Design. If scopes of work or statements of work are attached to work assignments, the package will be filed in 6.6 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged chronologically.

6.9 Bid Documents

This section will contain:

- Invitations for bid
- Submissions by potential contractors,
- Proposals
- Qualifications
- Specifications
- Correspondence related to bids during the Remedial Design.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency, and then chronologically.

7.0 Remedial Action (RA)

7.1 Correspondence

This section will contain:

- Correspondence (e.g., letters, memoranda)
- Oversight Letter (PRP)
- Obligation of Funds (Source document)
- Notes from meetings or telephone calls
- Contractor curriculum vitae (resumes)
- EPA trip reports related to the Remedial Action.

Letter reports with sampling data will be filed in 7.2 Sampling and Analysis Data.

File Arrangement: Documents will be arranged chronologically.

7.2 Sampling and Analysis Data

This section will contain:

- Chain of Custody forms
- Field Sampling Plans
- Data validation reports
- Unvalidated data
- Validated data obtained during the Remedial Design
- Air monitoring data
- Chemical descriptions
- Groundwater monitoring data
- Soil monitoring data
- Letter reports with sampling data
- Contract Laboratory Program (CLP) Status reports
- Environmental monitoring plans
- Environmental groundwater plans
- NPDES permit records

File Arrangement: Documents will be arranged by case number, if assigned or alphabetically by contractor and then chronologically.

7.3 Scopes of Work

This section will contain scopes of work or statements of work and related comments associated with the Remedial Action. If scopes of work or statements of work are attached to work assignments, the package will be filed in 7.6 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged chronologically.

7.4 Applicable or Relevant and Appropriate Requirements (ARARs)

This section will contain ARARs and associated correspondence relevant to the Remedial Action.

File Arrangement: Documents will be arranged chronologically.

7.5 Remedial Action Reports

This section will contain:

- Remedial Action Report
- Remedial Action Report approval memos/letters (Source document)
- Remedial Action start memo (Source document)
- Quality Assurance Project Plan
- Health and Safety plans
- Pre-Final Inspection Reports
- Certification Inspection Reports

Comments and responses to comments will be filed following the appropriate reports.

File Arrangement: Documents will be arranged chronologically.

7.6 Work Plans and Progress Reports

This section will contain:

- Contract Modifications (Source document)
- Progress reports
- Work plans (Source document)
- Work Plan approval letters
- Work plan amendments (Source document)
- Comments on the Work Plan
- Award fee performance reports
- Stop work orders
- Work assignments
- Work assignment amendments
- Amendment requests
- Cost estimates for specific work assignment tasks

Progress reports include all field notes and trip reports received from contractors. Also, progress reports that contain cost estimates or expenditures will be filed in this section.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency and then chronologically.

7.7 Cost Reports and Invoices

This section will contain cost reports and invoices associated with the Remedial Action. If cost reports and/or invoices are attached to progress reports, the package will be filed in 7.6 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency and then chronologically.

7.8 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs)

This section will contain interagency agreements (Source documents) and memoranda of understanding between EPA and other federal agencies related to the Remedial Action.

File Arrangement: Documents will be arranged chronologically.

7.9 Bid Documents

This section will contain:

Invitations for bid

Submissions by potential contractors,

Proposals

Qualifications

Specifications

Correspondence related to bids during the Remedial Action.

File Arrangement: Documents will be arranged by contractor or government agency and then chronologically.

8.0 Post Remedial Action

8.1 Correspondence

This section will contain:

- Correspondence (e.g., letters, memoranda)
- Oversight Letter (PRP)
- Notes from meetings or telephone calls
- Contractor curriculum vitae (resumes)
- EPA trip reports related to the Post-Remedial Action

Letter reports with sampling data will be filed in 8.4 Long-Term Response Monitoring.

File Arrangement: Documents will be arranged chronologically.

8.2 Deletion from National Priorities List

This section will contain all documents associated with a site's National Priorities List (NPL) deletion:

- Federal Register Notice of Intent to Delete (Source document)
- Federal Register Notice of Deletion (Source document)
- Federal Register Notice of Partial Deletion (Source document)
- NPL Deletion Packages
- Deletion Docket Index (Source document)
- Final Technical Reports
- Associated correspondence

File Arrangement: Documents will be arranged chronologically.

8.3 Long-Term Response Reports

This section contains:

- Five-Year Review Start Memo (Source document)
- Five-Year Review Work Plan (Source document)
- Five -Year Review Report (Source document)
- Five -Year Review Report approval (Source document)
- Preliminary Close-out Reports/PCOR (Source document)
- Final Close-out Reports/FCOR (Source document)
- Final Operations and Maintenance (O&M) Plan (Source document)
- Groundwater Monitoring (Post-ROD)
- Site Inspection Reports related to site closeout
- Field Service Reports
- Interim Leachate Management Reports

Comments and responses to comments will be filed following the appropriate reports.

File Arrangement: Documents will be arranged chronologically.

8.4 Long-Term Response Monitoring

This section will contain:

Chain of Custody forms

Sampling plans

Data validation reports

Field Sampling Plan

Unvalidated data

Validated data

Long-term monitoring reports

Air monitoring data

Chemical descriptions

Groundwater monitoring Start / first sample from existing well after ROD

Soil monitoring data

Letter reports with sampling data

Contract Laboratory Program (CLP) Status reports

Environmental monitoring plans

File Arrangement: Documents will be arranged chronologically.

8.5 Work Plans and Progress Reports

This section will contain:

Progress reports

Work plans

Work Plan approval letters (*Source document*)

Work plan amendments

Comments on the Work Plan

Award fee performance reports

Stop work orders

Work assignments

Work assignment amendments

Amendment requests

Cost estimates for specific work assignment tasks

Progress reports associated with the Post-Remedial Action, (including monthly reports required by the consent decree). Progress reports include all field notes

File Arrangement: Documents will be arranged alphabetically by contractor or government agency and then chronologically.

8.6 Cost Reports and Invoices

This section will contain cost reports and invoices associated with Post Remedial Action activities. If cost reports and/or invoices are attached to progress reports, the package will be filed in 8.5 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency and then chronologically.

8.7 Institutional Controls

This section will contain:

- Easements (Source document)
- Grants of environmental restriction and easements (ERE) (Source document)
- Zoning ordinances (Source document)
- Groundwater restrictions (Source document)
- Deed restrictions (Source document)
- Groundwater management plans (Source document)
- Property use restrictions (Source document)
- Liens (Source document)
- Other documents associated with the implementation and inspection of institutional controls.

Institutional Control Instruments and records captured in the Institutional Control Tracking database may be captured in this break or in other breaks depending on the document in question.

File Arrangement: Documents will be arranged by parcel and then chronologically.

8.8 Site Redevelopment – Correspondence

This section will contain correspondence (letters, memos, emails) dealing with the reuse of site property after completion of cleanup activities.

File Arrangement: Documents will be arranged chronologically.

8.9 Site Redevelopment Reports and Specifications

This section will contain reports dealing with the reuse of site property after completion of cleanup activities.

File Arrangement: Documents will be arranged chronologically.

8.10 Site Redevelopment – Maps and Plans

This section will contain maps and engineering drawings detailing the reuse of site property after completion of cleanup activities.

File Arrangement: Documents will be arranged chronologically.

9.0 State Coordination

9.1 Correspondence

This section will contain:

- Correspondence (e.g., letters, memoranda) and notes from meetings or telephone calls associated with EPA-State coordination.
- Approvals/certifications from states concerning Superfund activities (e.g., laboratory approvals,
- Contractual documents (e.g., requests for proposals, bid documents) associated with the state's procurement of contractor assistance
- Off-site hazardous waste storage facilities assurances
- Property access assurances
- Property acquisition assurances
- Indemnification agreements
- 20-year waste capacity assurances
- Quarterly progress reports submitted by the state to EPA.
- Quarterly financial reports submitted by the state to EPA

Correspondence between EPA and the state regarding specific site activities (e.g., Remedial Investigation, Remedial Design) will be filed according to the type of activity involved. State concurrence (or non-concurrence) letters on the Record of Decision (ROD) will be filed in 5.1 Correspondence.

File Arrangement: Documents will be arranged chronologically.

9.2 Cooperative Agreements

This section will contain:

- Cooperative Agreements (Source document)
- Interagency Agreements (Source document)
- Superfund removal agreements

File Arrangement: Documents will be arranged chronologically.

9.3 Superfund State Contracts (SSC)

This section will contain:

- Contracts between EPA and the state (Source document)
- Contract Modifications (Source document)

File Arrangement: Documents will be arranged chronologically.

9.4 State Assurances - Obsolete

As of 10/31/06, these documents will be filed in 9.1 Correspondence

9.5 Quarterly Progress Reports - Obsolete

As of 10/31/06, these documents will be filed in 9.1 Correspondence

9.6 Quarterly Financial Reports - Obsolete

As of 10/31/06, these documents will be filed in 9.1 Correspondence

9.7 Letters of Credit

This section will contain letters of credit associated with a cooperative agreement.

File Arrangement: Documents will be arranged chronologically.

9.8 State Contractor Documents - Obsolete

As of 10/31/06, these documents will be filed in 9.1 Correspondence

9.9 Responsible Federal Agency - State Contracts

This section will contain:

Contract Modifications (Source document)

Records (e.g., correspondence, contracts, Memoranda of Agreement) associated with contracts between the federal agency (e.g., Department of Defense, Department of Energy, and Department of the Interior) responsible for the hazardous waste cleanup at a federal facility and the state.

File Arrangement: Documents will be arranged chronologically.

9.10 State Technical and Historical Records

This section will contain technical and historical records generated or provided by the state:

Sampling data

Hydrogeological studies

Correspondence

Environmental impact statements

State action records

Technical records associated with a specific phase of the cleanup (e.g., comments on the Remedial Investigation report) will be filed in the appropriate section (3.6 Remedial Investigation Reports).

File Arrangement: Documents will be arranged chronologically.

10.0 Enforcement/Negotiation

10.1 Correspondence

This section will contain:

- Correspondence (e.g., letters, memoranda, e-mails)
- Notes from meetings or telephone calls related to enforcement activities.
- Case management documents
- Dismissal of Case Memo (Source document)
- DOJ Trial Date Memo (Source document)
- DOJ Withdrawal of Case Memo (Source document)
- Referral Letter Referring Case Back to Region for Settlement (Source document)
- Litigation Hold memo
- Planning documents (e.g., pert charts, gantt charts)
- Case status reports
- Enforcement strategy
- Case development plans.
- Drafts of documents, e.g. Consent Decrees, Administrative Orders, Litigation Reports
- Records associated with PRPs' non-compliance with a Consent Decree, Administrative Order by Consent or a Federal Facility Agreement
- Correspondence related to Dispute Resolution
- Senior Executive Committee documents
- Dispute Resolution Committee documents
- Stipulated Penalty documents related to Dispute Resolution related to non-compliance with a Federal Facility Agreement
- Potentially Responsible Party Start Checklist (Source document)

All correspondence, including draft documents circulated for review comments and approval, will be filed here in chronological order. PRP-Specific correspondence will be filed in 11.9.

File Arrangement: Documents will be arranged chronologically.

10.2 Department of Justice (DOJ) - Referral Documents

This section will contain:

- Referral Package final, sent by EPA to the DOJ (Source document)
- Referral Documents are also known as Litigation Reports
- Transmittal Letter to DOJ (Source document)

File Arrangement: Documents will be arranged chronologically.

10.3 State and Local Enforcement Records

This section will contain all documents or material related to state and local enforcement activities at a site.

- State closure orders

- State Consent Decrees

- State CD and 10 Point Settlement Transmittal Memo (Source document)

- Notices of Violation and Order and Penalty (NOVADs)

- National Pollution Discharge Elimination System (NPDES) permits and associated correspondence

File Arrangement: Documents will be arranged by agency/program, and then chronologically.

10.4 Interviews, Depositions, and Affidavits

This section will contain:

- Interviews by EPA Civil Investigator

- Depositions

- Affidavits obtained by EPA that relate to the site's enforcement activities.

This section will also contain records related to interviews, depositions, and affidavits (e.g., deposition transcripts, tape recordings, deposition synopses, attorney questions, exhibits provided by the attorney, notes taken by the attorney). Any documents furnished by the witness/interviewee should be cross-referenced with the transactional data base as required.

Depositions which have been filed with the court will be filed in 10.10 Litigation Documents. Affidavits which have been filed with the court as well as deposition subpoenas and notices of depositions will be filed in 10.9 Pleadings. Interviews conducted as part of PRP searches will be filed in 11.8 EPA/Contractor Deliverables and Supporting Documents and cross-referenced in this section.

File Arrangement: Documents will be arranged alphabetically by the name of the witness/interviewee and then chronologically.

10.5 Initiation of Negotiations (Sites with Multiple PRPs)

This break includes only settlement related documents; non-settlement documents involving two or more PRPs will be filed in 11.5 Multiple PRP Documents

Records to be filed in this break may include:

- De Minimis Offer (Source document)
- PRP Settlement Offer
- Good faith proposals
- De Micromis Offer (Source document)
- Orphan Share Offer
- Settlement Agreements (Source document)
- Payment schedules and associated records
- Final Settlement Agreements (Source document)
- Letters of Intent
- Memoranda of Understanding
- Memoranda of Agreement
- Reports related to negotiations with multiple (i.e., more than one) PRPs.

Documents produced or received in support of negotiations with specific PRPs will be filed in 11.9 PRP-Specific Correspondence.

File Arrangement: Documents will be arranged chronologically.

10.6 PRP-Specific Negotiations – Obsolete

As of 10/31/06, these documents will be filed in 11.9 with correspondence for the particular PRP

10.7 EPA Administrative Orders

This section will contain Administrative Orders (both unilateral and consensual) (*Source document*) issued by EPA under CERCLA, and 122 (h) Administrative Agreements for Cost Recovery:

- Administrative Order on Consent (AOC) (Source document)
- Unilateral Administrative Order (UAO) (Source document)
- Administrative Agreement for Cost Recovery
- Consent Agreement (Source document)

Associated correspondence and comments will be filed in 10.1 Correspondence, chronologically.

Records associated with PRPs' non-compliance with an Administrative Order by Consent will be filed in 10.1.

File Arrangement: Documents will be arranged chronologically.

10.8 EPA Consent Decrees

This section will contain final Consent Decrees (*Source document*) issued by the courts at the request of EPA under CERCLA, and exhibits associated with Consent Decree actions will be filed in this section. .

- Consent Decrees (Source document)

- De minimis settlements (Source document)

- Consent Decree and 10 Point Settlement Transmittal Memo (Source document)

- Consent Decree Transmittal Memo (Source document)

- 10-point settlement analyses (Source document)

- Settlement Agreements – Final payment schedules (Source document)

- Volumetric Ranking

- Escrow agreements

- Trust agreements

- Financial assurance documents/financial assurance instruments (FAI) verifying the solvency of the PRP(s), such as:

 - Corporate Guarantee (Source document)

 - Financial Test (Source document)

 - Insurance Policy (Source document)

 - Letters of Credit (Source document)

 - Performance Bond (Source document)

 - Trust Fund (Source document)

 - Surety Bonds (Source document)

 - Annual Reports (Source document)

Drafts, comments and correspondence related to the Consent Decree will be filed in 10.1 Correspondence.

Records associated with PRPs' non-compliance with a Consent Decree will be filed in 10.1 Correspondence

File Arrangement: Documents will be arranged chronologically.

10.9 Pleadings

This section will contain pleadings, which document the procedural steps during litigation. Correspondence and comments associated with pleadings will be filed in 10.1 Correspondence.

Examples of documents which will be filed in this minor break include:

- Answers
- Briefs
- Certificates of Service
- Certifications
- Complaints
- Counterclaims
- Exhibit Lists
- Interrogatories
- Judgments
- Jury instructions
- Memoranda of Law
- Motions
- Notices
- Objections and Oppositions
- Orders
- Petitions
- Pre-trial Conferences
- Preliminary Injunctions
- Requests for Production of Documents [where U.S. is a party]
- Responses*
- Rulings
- Stipulations
- Subpoenas
- Warrants (Signed by Federal Judge) (Source document)
- Witness lists

File Arrangement: Documents will be arranged chronologically.

10.10 Litigation/Trial Documents

This section will contain litigation documents other than pleadings. This section will include documents produced by EPA, Department of Justice, or contractors to support litigation activities;

Examples of litigation documents include:

- Certification of Documents
- Court transcripts
- Data Summaries
- Trial exhibits (e.g., charts, maps, aerial photographs)
- Legal research/references
- Lists/indexes produced in response to requests for production of documents
- Material related to the selection of expert witnesses
(e.g., resumes, technical reports written by candidates, interview notes, correspondence between candidates and EPA)
- Privilege logs
- Privilege Screening Sheets
- PRP Liability Checklists
- Discovery (interrogatories, request for production of documents, subpoenas) and discovery responses
- Depositions, including the Notice of Deposition, the transcript and copies of exhibit, for each witness.
Data summaries
Privilege screening sheets
PRP liability checklist
Privileged document coding forms

File Arrangement: Documents will be arranged chronologically.

10.11 PRP Enforcement Work Plans - Obsolete

This section is obsolete. PRP work plans which address a specific technical phase (e.g., Remedial Design, Remedial Action) will be filed in the appropriate section (e.g., 6.6 Work Plans and Progress Reports, 7.6 Work Plans and Progress Reports).

10.12 Litigation Support Documents - Obsolete

As of 10/31/06 these documents will be filed in 10.10 Trial/Litigation Related Documents

10.13 Contractor Statements/Scopes of Work

This section will contain scopes of work and statements of work and related comments associated with enforcement activities (e.g., litigation support). If scopes of work or statements of work are attached to work assignments, the package will be filed in 10.14 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged chronologically.

10.14 Contractor Work Plans and Progress Reports

This section will contain:

- Progress reports
- Work plans
- Work Plan approval letters
- Work plan amendments
- Comments on the Work Plan
- Award fee performance reports
- Stop work orders
- Amendment requests
- Cost estimates for specific work assignment tasks
- Work assignments
- Work assignment amendments

Progress reports include all field notes Work assignments

File Arrangement: Documents will be arranged alphabetically by contractor or government agency and then chronologically.

10.15 Cost Reports and Invoices

This section will contain cost reports and invoices associated with enforcement activities. If cost reports and/or invoices are attached to progress reports, the package will be filed in 10.14 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency and then chronologically.

10.16 Federal Facility Agreements

This section will contain records associated with agreements between a federal facility, EPA, and the state, if applicable.

- Interagency Agreements (Source document)
- Correspondence relating to Federal Facility Agreement negotiation
- Correspondence regarding state involvement in Federal Facility Agreements
- Federal Facility Agreements
- Public comments and responses to Federal Facility Agreements
- Amendments to Federal Facility Agreements
- Modifications to Federal Facility Agreements

File Arrangement: Documents will be arranged chronologically.

10.17 Dispute Resolution/Non-Compliance Documents - Obsolete

As of 10/31/06, these documents will be filed in 10.1 Correspondence

This section will contain

File Arrangement: Documents will be arranged chronologically.

10.18 RCRA Documents Produced for Discovery

This section will contain records associated with RCRA, which have been reviewed for privilege for document production.

File Arrangement: Documents will be arranged chronologically.

10.19 Decision not to Pursue Costs

This section will contain the Decision not to Pursue Costs (Source document)

10.20 Tolling Agreements

This section will contain signed tolling agreements (Source document). Related correspondence will be filed in 11.9, for each PRP.

11.0 Potentially Responsible Parties (PRPs)

11.1 PRP Lists

This section will contain:

- PRP lists
- Generator rankings
- Mailing Lists
- Volumetric Ranking

File Arrangement: Documents will be arranged chronologically.

11.2 Contractor Correspondence

This section will contain correspondence (e.g., letters, memoranda) and notes from meetings or telephone calls with an EPA contractor associated with PRP activities (e.g., PRP searches, title searches).

File Arrangement: Documents will be arranged chronologically.

11.3 Contractor Work Plans and Progress Reports

This section will contain:

- Progress reports
- Work plans
- Work Plan approval letters
- Work plan amendments
- Comments on the Work Plan
- Work assignments
- Work assignment amendments
- Award fee performance reports
- Stop work orders

File Arrangement: Documents will be arranged alphabetically by contractor or government agency and then chronologically.

11.4 Contractor Cost Reports and Invoices

This section will contain cost reports and invoices associated with PRP activities (e.g., PRP searches, title searches). If cost reports and/or invoices are attached to progress reports, the package will be filed in 11.3 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency and then chronologically.

11.5 Multiple PRP Documents

This section will contain all related to two or more PRPs, including master information request letters and all documents relating to negotiations (except for formal institution of negotiations documents filed in 10.5 Negotiations with Multiple PRPs).

Master information request letters and master notice letters will be filed in this section.

Evidence summary (tip) sheets concerning multiple PRPs

Documents related to one specific PRP will be filed in 11.9 PRP-Specific Documents.

Documents in the following categories will be filed in this section:

- Multiple PRP Correspondence
- Multiple PRP Evidence-Government Agency Documents
- Multiple PRP Evidence
- Multiple PRP-Related Documents
- Multiple PRP Financial Status Documents

Definitions:

Multiple PRP Correspondence includes letters, memoranda and notes from meetings or telephone calls relating to multiple PRPs (e.g., letters from attorneys representing multiple PRPs).

Multiple PRP Evidence-Government Agency Documents include records acquired directly from local, state, or federal agencies that identify or describe the activities of multiple PRPs (e.g., permit applications, permits, and inspection reports).

Multiple PRP Evidence includes any material acquired from PRPs or other sources that provide information on the types, amounts, and dates that waste was transported, stored, discharged or disposed of by multiple PRPs (e.g., canceled checks, check stubs, invoices, manifests, gate logs, letters, and inspection reports).

Multiple PRP-Related Documents include non-evidential information on multiple PRPs (e.g., private investigator reports that are not part of the PRP search, summary sheets of waste types and volumes). Documents may be provided by PRPs, EPA contractors, or generated by EPA.

Multiple PRP Financial Status Documents include material pertaining to the financial history of multiple PRPs (e.g., Dun and Bradstreet Reports, insurance coverage, property appraisals, corporate reports).

File Arrangement: Documents will be arranged chronologically.

11.6 Site Level - Evidence - Government Agency Documents - Obsolete

This section is obsolete. Documents formerly filed in this section will now be filed in 11.5 Multiple PRP Documents.

11.7 PRP Steering Committee Documents- Obsolete

As of 10/31/06 these documents will be filed in 10.1 Correspondence

11.8 EPA/Contractor Deliverables and Supporting Documentation.

This section will contain:

- Responsible Party Search

- NEIC reports

- Transactional Database

- Correspondence Database

- Investigator reports

- Enforcement First Report (Source document)

- Preliminary Search Report (Source document)

- Final Search Report (Source document)

- Search Outcome Report (Source document)

- Search Plan/Document Search (Source document)

- Summary of Basic PRP Search Tasks (Source document)

- Supporting documentation (e.g., interview notes from responsible party search) associated with PRP liability issues and completed by EPA's contractor (Source document)

File Arrangement: Documents will be arranged chronologically.

11.9 PRP-Specific Documents

This section will contain documents related to specific PRPs or PIPs (Potentially Interested Parties). Negotiation documents related to multiple PRPs will be filed in 11.5 Multiple PRP Documents.

This section combines what were minor breaks 11.9 through 11.13 in Version 2.0 of the file structure. Documents in the following categories will be filed here:

- 104e Information Requests (Source document)
- 104e Response
- 104e Notice/Warning (Source document)
- 104 Failure to Respond Letter (Source document)
- 107 Referral memos to DOJ (Source document)
- Bankruptcy Referral/Proof of Claim (Source document)
- Bankruptcy Settlement (Source document)
- Bankruptcy, Signed Final Judgement (Source document)
- Bankruptcy Strategy Package (Source document)
- Comfort/Status Letter (Source document)
- Demand Letter (Source document)
- General Notice Letter (Source document) and any specific response to the notice letter
- Lien – Applied by EPA (Source document)
- Lien Release (Source document)
- Notice of Intent to Comply (Source document)
- Prospective Purchaser Agreement (Source document)
- Proposed Purchaser Agreement (Source document)
- De Minimis and De Micromis Responses
- PIP Letter
- PIP Response
- PRP-Specific Correspondence
- Ability to Pay Analysis & Decision
- Settlement Agreements (Source document)
- Draft Payment Schedules (Source document)
- Special Notice Letter (Source document)
- Special Notice Letter Waiver (Source document)
- Special Notice Response
- PRP-Specific Evidence
- PRP-Related Documents
- Requests for extension of time for General Notice Response
- Warning Letters (Source document)

Definitions:

PRP-Specific Correspondence includes letters, memoranda and notes from meetings or telephone calls relating to one PRP (e.g., General and Special Notice letters 104(e) information requests (*Source document*) and responses, 3007(c) letters), Ability to Pay Analyses, Warning Letters.

PRP-Specific Evidence includes any material acquired from a PRP or other source that provides information on the types, amounts, and dates that waste was transported, stored, discharged or disposed of by a PRP (e.g., invoices, manifests, canceled checks, check stubs, gate logs, letters, or inspection reports). Included in this section are PRP responses to 104(e) information requests. Also included are permit applications, permits, inspection reports, Formerly Utilized MED/ AEC Sites Remedial Action Program (FUSRAP), *and Articles* of Incorporation.

PRP-Related Documents include non-evidential information on a specific PRP (e.g., company history, civil and private investigator reports that are not part of the PRP search, summary sheets of waste types and volumes, Prospective purchaser agreements). Documents may be provided by a PRP, EPA contractors, or generated by EPA.

PRP-Specific Financial Status Documents include material pertaining to a specific PRP's financial history:

Dun and Bradstreet Reports, liability insurance coverage, property appraisals, corporate annual reports, bankruptcy records).

Financial Assurance Instruments (FAI) will be filed in 10.8 EPA Consent Decrees.

11.10 PRP-Specific Evidence - Government Agency Documents - Obsolete

This section is obsolete. Documents formerly filed in this section will now be filed in 11.9 PRP-Specific Documents.

11.11 PRP-Specific Evidence - Obsolete

This section is obsolete. Documents formerly filed in this section will now be filed in 11.9 PRP-Specific Documents.

11.12 PRP-Related Documents- Obsolete

This section is obsolete. Documents formerly filed in this section will now be filed in 11.9 PRP-Specific Documents.

11.13 Financial Status Documents - Obsolete

This section is obsolete. Documents formerly filed in this section will now be filed in 11.9 PRP-Specific Documents.

11.14 Title Searches

This section will contain all title search work:

- Appraisals
- Deeds
- Mortgages
- Liens (not applied by EPA)
- Associated correspondence
- Lease agreements, which are filed in registry of Deeds.
- Property Evaluations & assessments
- Tax Assessor Land Survey

Title searches may be conducted by EPA, an EPA contractor, or submitted by other organizations (e.g., PRPs, citizen groups)

File Arrangement: Documents will be arranged chronologically.

11.15 Non-Binding Allocation of Responsibility (NBAR)

This section will contain the Non-Binding Allocation of Responsibility and associated correspondence.

File Arrangement: Documents will be arranged chronologically.

11.16 Scopes of Work

This section will contain scopes of work or statements of work and related comments associated with PRP activities (e.g., PRP searches, waste volume analyses). If scopes of work or statements of work are attached to work assignments, the package will be filed in 11.3 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged chronologically.

12.0 Cost Recovery

12.1 Correspondence

This section will contain correspondence (e.g., letters, memoranda) and notes from meetings or telephone calls related to Cost Recovery. For Cost Packages generated after October 2006, this section will contain a CD or DVD on which a cost summary and scanned supporting documents have been burned.

E-mail Confirmation of Site Spill Identifier (SSID) (*Source Document*)

File Arrangement: Documents will be arranged chronologically.

12.2 Software Package for Unique Reports (SPUR Reports) - Obsolete

These documents are no longer generated.

12.3 Cost Summaries

This section will contain:

Cost summary reports provided by EPA Region I

Certified Summary report which incorporates the EPA Headquarters and EPA Region 1 cost summary reports.

File Arrangement: Documents will be arranged chronologically.

12.4 Travel Vouchers - Obsolete

As of 2002, paper documents have been replaced by system generated reports.

12.5 Timesheets - Obsolete

As of 2004, paper documents have been replaced by system generated reports.

12.6 Agency Indirect Costs - Obsolete

These reports are no longer generated.

12.7 Miscellaneous Procurement Expenses

Miscellaneous procurement expenses include all expenses made with purchase orders for under \$10,000.00.

File Arrangement: Documents will be arranged chronologically.

12.8 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs) - Obsolete

This section is obsolete.

12.9 State Cooperative Agreements - Obsolete

This section is obsolete.

12.10 EPA-State Contracts - Obsolete

This section is obsolete.

12.11 Contractor Deliverables Related to Cost Recovery

This section will contain contractor deliverables associated with Cost Recovery. EPA contractors may include private companies as well as organizations such as NEIC and PIC. Technical Direction Documents (Source document)

File Arrangement: Documents will be arranged alphabetically by contractor, and then chronologically.

12.12 Work Plans and Progress Reports

This section will contain:

- Progress reports
- Work plans
- Work Plan approval letters
- Work plan amendments
- Comments on the Work Plan
- Work assignments
- Work assignment amendments
- Award fee performance reports
- Stop work orders Progress reports

Progress reports include all field notes and trip reports received from contractors. Also, progress reports that contain cost estimates or expenditures will be filed in this section.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency, and then chronologically.

12.13 Cost Reports and Invoices Related to Cost Recovery

This section will contain cost reports and invoices associated with Cost Recovery. If cost reports and/or invoices are attached to progress reports, the package will be filed in 12.12 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency, and then chronologically.

12.14 Cost Recovery Documentation Checklists

This section will contain the Cost Recovery Documentation Checklists.

File Arrangement: Documents will be arranged chronologically.

12.15 Contractor Cost Information

This section will contain the cost summary and supplementary documents (e.g., SF 1034) for each contractor. This section also includes the cost summary and supplementary documents (e.g. transfer requests and drawdown requests) for interagency agreements and state cooperative agreements.

File Arrangement: Documents will be arranged alphabetically by contractor, and then chronologically.

12.16 Settlement Agreements -- Final Payment Schedules-Single PRP – Obsolete

As of October 31, 2006, these documents will be filed in 10.8.

12.17 Settlement Agreements -- Final Payment Schedules -- Multiple PRPs - Obsolete

As of October 31, 2006, these documents will be filed in 10.8.

12.18 Work Performance Documents

This section will contain all work performance documents:

- Progress reports

- Scopes of work

- Work assignments

- TDDs

- Statements of work

- and all associated amendments) gathered as part of the Cost Recovery package.

File Arrangement: Documents will be arranged chronologically.

12.19 Special Accounts Management

This section will contain documents tracking the management and allocation of funds from site-specific special accounts.

File Arrangement: Documents will be arranged chronologically.

12.20 Oversight Bill Packages

This section will contain completed oversight bill packages exported from the SCORPIOS program.

- Future Response Costs Bill Package (Source document)

- Oversight Bill Package (Source document)

File Arrangement: Documents will be arranged chronologically.

13.0 Community Relations

13.1 Correspondence

This section will contain:

- Correspondence (e.g., letters, memoranda)
- Letter transmitting the Admin. Record to the repository (Source document)
- Correspondence sent to the Mailing List
- Comments from the public
- Responses to public comments
- Notes from meetings or telephone calls related to Community Relations activities

Letters to the public regarding sampling results will be filed in this section.

File Arrangement: Documents will be filed chronologically.

13.2 Community Relations Plans

This section will contain:

- Community Relations/Involvement Plans
- Comments and responses to comments on the Community Relations Plan Approval letters
- Distribution lists
- Executive summaries

For each Community Relations Plan, documents will be filed in the following order: distribution list, executive summary, Community Relations Plan, comments, responses to comments, and approval letters.

File Arrangement: Documents will be arranged chronologically.

13.3 News Clippings/Press Releases

This section will contain:

- News clippings
- Press releases
- Public Notice
- Announcements in the Federal Register

File Arrangement: Documents will be arranged chronologically.

13.4 Public Meetings/Hearings

This section will contain documents associated with public meetings, public hearings, workshops, and press conferences:

- Agendas
- Attendance lists
- Meeting summaries
- Transcripts
- Handouts
- Meeting notes
- Practice questions

File Arrangement: Documents will be arranged chronologically.

13.5 Fact Sheets/Information Updates

This section will contain:

- Fact Sheets
- Information Updates
- Comments and responses to comments

File Arrangement: Documents will be arranged chronologically.

13.6 Mailing Lists

This section will contain mailing lists with names and addresses of:

- Members of the public interested in the site
- Citizen action groups
- Potentially Responsible Parties (PRPs)
- Newspapers showing interest in the site

PRP lists will also be filed in 11.1 PRP Lists.

File Arrangement: Documents will be arranged chronologically.

13.7 Technical Assistance Grants (TAGs)

Technical Assistance Grants (TAGs) are given to community groups to allow them to retain experts to review documents related to an NPL site. This section will contain:

- Contract Modifications (Source Document)
- Grant applications
- Associated correspondence

File Arrangement: Documents will be arranged chronologically.

13.8 Scopes of Work

This section will contain scopes of work or statements of work and related comments associated with Community Relations activities. If scopes of work or statements of work are attached to work assignments, the package will be filed in 13.9 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged chronologically.

13.9 Work Plans and Progress Reports

Progress reports include all field notes and trip reports received from contractors. Also, progress reports that include cost estimates or expenditures will be filed in this section.

This section will contain:

- Progress reports
- Work Plans
- Work Plan Amendments
- Work Plan Approvals

File Arrangement: Documents will be arranged alphabetically by contractor or government agency, and then chronologically.

13.10 Cost Reports and Invoices

This section will contain cost reports and invoices associated with Community Relations activities. If cost reports and/or invoices are attached to progress reports, the package will be filed in 13.9 Work Plans and Progress Reports.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency, and then chronologically.

13.11 Technical Review Committee (TRC) Documents

Technical Review Committees are formed to involve the public in the cleanup of federal facility NPL sites. This section will contain records associated with

- Technical Review Committee meetings
- Agendas
- Attendance lists
- Handouts
- Meeting notes
- Meeting summaries
- Practice questions
- Transcripts

File Arrangement: Documents will be arranged chronologically.

14.0 Congressional Relations

14.1 Correspondence

This section will contain correspondence (e.g., letters, memoranda), notes from meetings or telephone calls and presentations related to state and federal congressional involvement with the site.

File Arrangement: Documents will be arranged chronologically.

14.2 Transcripts

This section will contain all transcripts from state and federal congressional inquiries or hearings. Transcripts from public meetings or public hearings will be filed in 13.4 Public Meetings/Hearings.

File Arrangement: Documents will be arranged chronologically.

14.3 Testimonies

This section will contain all documents generated during state and federal congressional inquiries or hearings.

File Arrangement: Documents will be arranged chronologically.

14.4 Published Hearing Records

This section will contain all published hearing records from state and federal congressional inquiries or hearings. Transcripts from public meetings or public hearings will be filed in 13.4 Public Meetings/Hearings.

File Arrangement: Documents will be arranged chronologically.

15.0 Freedom of Information Act (FOIA) Management

15.1 Correspondence

This section will contain correspondence (e.g., letters, memoranda) and notes from meetings or telephone calls related to Freedom of Information Act (FOIA) management. Any correspondence containing a FOIA request or response will be filed in the appropriate section: 15.2 Requests / Responses.

File Arrangement: Documents will be arranged chronologically.

15.2 Requests/Responses

This section will contain all FOIA requests and responses.

File Arrangement: Documents will be arranged numerically by FOIA number, then chronologically.

15.3 Requests/Responses - Obsolete

This section is obsolete. Use 15.2.

15.4 Appeals

This section will contain the complete appeal package (e.g., original FOIA request, EPA's denial of request, associated correspondence).

File Arrangement: Documents will be arranged numerically by FOIA number, then chronologically.

16.0 State and Federal Natural and Historical Resource Trustee

16.1 Correspondence

This section will contain correspondence (e.g., letters, memoranda) and notes from meetings and telephone calls associated with state and federal Natural and Historical Resource Trustees.

These Trustees may include:

- Department of Interior (DOI)
- Indian Tribes
- National Oceanic and Atmospheric Administration (NOAA)
- Department of Agriculture (DOA)
- Department of Defense (DOD)
- Department of Energy (DOE)

Correspondence related to state Natural Resource Trustees will be filed in 9.1 Correspondence.

File Arrangement: Documents will be arranged chronologically.

16.2 Interagency Agreements (IAGs)/Memoranda of Understanding (MOUs)

This section will contain interagency agreements/memoranda of understanding between EPA and state or federal Natural and Historical Resource Trustees. (Source document)

File Arrangement: Documents will be arranged chronologically.

16.3 Natural Resource Trustee Release

This document, prepared by EPA and the state or federal Natural Resource Trustees, determines if environmental damages will be included in PRP negotiations.

File Arrangement: Documents will be arranged chronologically.

16.4 Trustee Notification Form and Selection Guide

This form, submitted by the EPA Region I Natural Resource Coordinator (NRC), officially notifies the state and federal Natural Resource Trustees of the status of a site.

File Arrangement: Documents will be arranged chronologically.

16.5 Technical Issue Papers

Natural and Historical Resource Trustees may develop technical issue papers on a variety of topics related to their specific areas of interest (e.g., inland wildlife habitat, fishery resources of the continental shelf, anadromous fish, tidal wetlands, forests, indigenous settlement areas, structures of historical value). Included in this section will be DOI's Preliminary Natural Resource Surveys (PNRS).

File Arrangement: Documents will be arranged alphabetically by trustee organization and then chronologically.

17.0 Site Management Records

17.1 Correspondence

This section will contain documents related to site management activities:

- Correspondence (e.g., letters, memoranda)
- Meeting Notes
- Notes of telephone calls
- RPM log books

Agenda, notes, summaries, and comments pertaining to Management Review Committee Meetings will be filed in 17.6 Site Management Plans and Reviews.

File Arrangement: Documents will be arranged chronologically.

17.2 Access Records

This section will contain records (e.g., access agreements and related correspondence) regarding access to NPL and removal action sites and related property.

File Arrangement: Documents will be arranged chronologically and then alphabetically by the name of the property owner.

17.3 Site Security Records

This section will contain documents associated with the security of a remedial site:

- Entry/exit logs
- Security inspection reports
- Associated correspondence
- Security records related to removal action sites will be filed in 2.12 On-Site Registers and Logs.

File Arrangement: Documents will be arranged chronologically.

17.4 Non-Print Materials

This section will contain audio-visual records not associated with a specific phase of the site, and associated correspondence and reports:

- Aerial survey reports
- Blueprints
- Diskettes
- Historical site analysis reports with aerial photographs
- Maps
- Negatives
- Photo documentation logs
- Photographs
- Slides
- Tape recordings
- Videotapes

Non-print materials associated with removal activities will be filed in 2.2 Removal Response Reports.

File Arrangement: Records will be arranged by type (e.g., photographs, maps, slides, drawings) and then chronologically.

17.5 Site Descriptions/Chronologies

This section will contain documents developed by EPA or its contractors describing overall site activities:

- Chronologies
- Descriptions
- Histories
- Project schedules
- Pert or Gantt charts

Descriptions of activities for specific phases (e.g., Removal, Remedial Investigation) will be filed in the appropriate section (e.g., 2.1 Correspondence, 3.1 Correspondence).

File Arrangement: Documents will be arranged chronologically.

17.6 Site Management Plans and Reviews

This section will contain:

- Site Management Plan
- Agendas associated with Site Management Review Committee meetings
- Correspondence
- Final Site Management Plans
- Handouts
- Integrated Site Information Forms (ISIFs)
- Meeting notes
- Site Management Reviews (SMRs)
- Superfund Comprehensive Accomplishment Plans (SCAPs)

In addition, Master Environmental Plans related to federal facilities will be filed in this section. Comments and responses to comments will be filed following the appropriate plan or report.

File Arrangement: Documents will be arranged chronologically.

17.7 Reference Documents

This section will contain reference material gathered by EPA site teams:

- Journal articles
- Textbooks
- Applicable sections of the Federal Register
- Studies performed by learned institutions
- Status of Case Law

File Arrangement: Documents will be arranged alphabetically by title.

17.8 Federal and Local Technical and Historical Records

This section will contain technical and historical records generated or provided to EPA by federal and local government organizations and not directly related to a specific phase of the cleanup:

- Condemnation reports and associated correspondence
- Environmental impact statements
- Hydrogeological studies
- Sampling data

Technical records associated with a specific phase of the cleanup will be filed in the appropriate section (e.g., 3.4 Interim Deliverables, 4.4 Interim Deliverables).

Technical and historical records generated or provided by the state will be filed in 9.10 State Technical and Historical Records.

File Arrangement: Documents will be arranged alphabetically by title.

17.9 Site Safety Plans

This section will contain site safety plans for overall site activities. Phase-specific safety plans will be filed in the appropriate section (e.g., 3.4 Interim Deliverables).

File Arrangement: Documents will be arranged chronologically.

17.10 Base Closure Documents

This section will contain records associated with closure of a federal facility (e.g., correspondence, Transfer Property Assessment Documents).

File Arrangement: Documents will be arranged chronologically.

18.0 Toxic Substances Control Act (TSCA)

This section will contain documents created to support TSCA investigations when those files are being used to support a Superfund cleanup. Otherwise, TSCA documents will be filed separately according to the TSCA file procedures.

Formerly, this Major Break was used for Initial Remedial Measure (IRM) Records. IRM documents formerly filed in this major break will now be filed in 2.0 Removal Response.

18.1 TSCA Files

This section will contain documents provided by the TSCA program staff

File Arrangement: Documents will be arranged according to TSCA filing procedures, as received from the TSCA program.

19.0 Resource Conservation and Recovery Act (RCRA) Records

This section will contain documents created to support RCRA investigations and cleanups when those files are now being used to support a Superfund cleanup. Otherwise, RCRA documents will be filed separately according to the RCRA file structure.

19.1 TSCA Files

This section will contain documents provided by the RCRA program staff

File Arrangement: Documents will be arranged according to RCRA filing structure, as received from the RCRA program.

20.0 Records Management

20.1 Administrative Record Indexes

This section will contain indexes for:

- Proposed Plan Administrative Record (Source document)
- Record of Decision Administrative Record (Source document)
- Record of Decision Amendment Administrative Record (Source document)
- Explanation of Significant Differences (ESD) Administrative Record (Source document)
- Engineering Evaluation/Cost Analysis (EE/CA) Administrative Record (Source document)
- Non-Time Critical Removal Action (NTCRA) Administrative Record (Source document)

File Arrangement: Documents will be arranged chronologically.

20.2 Federal Archiving Forms Obsolete, as of March 31, 2012 these documents will be filed in a separate non-site-specific file. See RM SOP007, 008, & 033.

This section will contain forms that provide the location of documents maintained at the Federal Records Center (i.e., SF 135).

File Arrangement: Documents will be arranged chronologically.

20.3 Work Plans and Progress Reports

This section will contain:

- Progress reports
- Work plans
- Work Plan approval letters (*Source document*)
- Work plan amendments
- Comments on the Work Plan
- Award fee performance reports
- Stop work orders
- Work assignments
- Work assignment amendments
- Amendment requests
- Cost estimates for specific work assignment tasks

Progress reports associated with the Records Management activities, (including monthly reports required by the consent decree). Progress reports include all field notes.

File Arrangement: Documents will be arranged alphabetically by contractor or government agency and then chronologically.

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